UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

IN RE NEW ENGLAND COMPOUNDING PHARMACY, INC. PRODUCTS LIABILITY LITIGATION)))) MDL No. 2419
THIS DOCUMENT RELATES TO:) Dkt. No 1:13-md-2419 (RWZ)
All Actions	,))
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ASSENTED-TO MOTION TO EXTEND DEADLINE FOR RESPONSE TO MOTION FOR ENTRY OF DEPOSITION AND ESI PROTOCOLS

Saint Thomas West Hospital, formerly known as St. Thomas Hospital, Saint Thomas Network, Saint Thomas Health, Ascension Health Alliance, and Ascension Health (collectively, the "Saint Thomas Entities"), with the assent of the Plaintiffs' Steering Committee ("PSC"), move for an extension of the deadline for the Saint Thomas Entities to file their response to the Motion for Entry of Deposition and ESI Protocols by Plaintiffs' Steering Committee (Docket #876) (the "Motion") to February 28, 2014. In support of this motion, the Saint Thomas Entities state as follows:

- 1. The Saint Thomas Entities and the PSC have been continuing to meet and confer regarding the issues raised in the Motion. The parties have a planned conference for tomorrow, February 25, 2014, to discuss deposition and ESI protocols.
- 2. This brief extension will help the Saint Thomas Entities tailor their response to the issues that still need to be addressed and present the main areas of dispute in an orderly fashion to the Court.
 - 3. The PSC assents to this short extension.

For these reasons, the Saint Thomas Entities respectfully request, with the assent of the PSC, that the Court grant their motion and enter an order extending the date for the Saint Thomas Entities to file their in response to the Motion until February 28, 2014.

Saint Thomas West Hospital, Saint Thomas Network, Saint Thomas Health, Ascension Health Alliance, and Ascension Health

By its attorneys,

/s/ Sarah P. Kelly

Sarah P. Kelly (BBO #664267) Nutter McClennen & Fish, LLP Seaport West, 155 Seaport Blvd. Boston, Massachusetts 02210 Telephone: (617) 439-2000

Facsimile: (617) 310-9000

skelly@nutter.com

YVONNE K. PUIG
Texas State Bar No. 16385400
ERIC J. HOFFMAN
Texas State Bar No. 24074427
FULBRIGHT & JAWORSKI L.L.P.
98 San Jacinto Blvd. Suite 1100
Austin, Texas 78701
(512) 536-2450
(512) 536-4598 (FAX)

Admitted Pro Hac Vice

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/s/ Mark Zamora

Mark Zamora PO Box 660216 Atlanta, GA 30366 mark@markzamora.com

Dated: February 24, 2014 Counsel for PSC

CERTIFICATE OF SERVICE

I certify that, on February 24, 2014, this document (filed through the ECF system) will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

/s/ Sarah P. Kelly Sarah P. Kelly

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